

<p style="text-align: right;">Page 10</p> <p>1 Would you raise your right hand, please?</p> <p>2 (Witness sworn by the court reporter.)</p> <p>3 THE REPORTER: Thank you.</p> <p>4 And statements -- you can put your hand</p> <p>5 down --</p> <p>6 THE WITNESS: Okay.</p> <p>7 THE REPORTER: Statements by the court</p> <p>8 reporter, according to Rule 30(b) have been waived by</p> <p>9 all parties present.</p> <p>10 Would Counsel please state any agreements</p> <p>11 that haven't already been stated on the record, on the</p> <p>12 record. Just according to the Federal Rules, correct?</p> <p>13 MS. PERALES: We have no additional</p> <p>14 agreements to state.</p> <p>15 THE REPORTER: Thank you.</p> <p>16 MS. PERALES: Are you ready, Mr. Lopez?</p> <p>17 THE WITNESS: Oh, yeah.</p> <p>18 REVELINO LOPEZ,</p> <p>19 having being first duly sworn, testified as follows:</p> <p>20 EXAMINATION</p> <p>21 BY MS. PERALES:</p> <p>22 Q. Can you please state your name for the record?</p> <p>23 A. Rivelino Lopez.</p> <p>24 Q. Thank you. My name is Nina Perales, and I</p> <p>25 represent some of the Plaintiffs in this case. I'm with</p>	<p style="text-align: right;">Page 12</p> <p>1 understanding and answering accurately?</p> <p>2 A. No. I'm ready.</p> <p>3 Q. Okay. Thank you. This is your deposition.</p> <p>4 You are not noticed for very many topics, so I don't --</p> <p>5 I don't see this going too long, but I want you to know</p> <p>6 that if you have a need for a break at any time, you are</p> <p>7 not my hostage; you can take a break. The only thing I</p> <p>8 ask is that we take the break after you answer my</p> <p>9 question. So if there's a question still out there on</p> <p>10 the table, that you answer it before we go on the break.</p> <p>11 Is that all right with you?</p> <p>12 A. Yes.</p> <p>13 Q. All right. And you're doing a great job of</p> <p>14 answering out loud, but I'm going to remind you that the</p> <p>15 court reporter cannot take down head nods or shakes or</p> <p>16 shrugs, so will you agree to make your answers out loud?</p> <p>17 A. Yes.</p> <p>18 Q. Thank you. And then, of course, if you would,</p> <p>19 wait for me to finish my question before you start your</p> <p>20 answer and I'll wait for you to finish your answer</p> <p>21 before I start my next question so we don't talk over</p> <p>22 each other. Is that okay?</p> <p>23 A. Yes.</p> <p>24 Q. Thank you. I'm entitled to your best estimate</p> <p>25 but I don't want you to guess on anything.</p>
<p style="text-align: right;">Page 11</p> <p>1 the Mexican American Legal Defense and Educational Fund,</p> <p>2 MALDEF, and I represent organizations and voters in this</p> <p>3 case who are challenging the law we refer to as SB 1.</p> <p>4 A. Okay.</p> <p>5 Q. Have you ever had your deposition taken before?</p> <p>6 A. Before February, I had zero. Now this is my</p> <p>7 third one in the last two months, yeah, so...</p> <p>8 Q. Well, then you're an expert.</p> <p>9 A. Yeah.</p> <p>10 Q. I'm just going to, quickly, because you are</p> <p>11 experienced, go through some of the ground rules to</p> <p>12 refresh your memory of how we do some of this.</p> <p>13 A. All right.</p> <p>14 Q. Do you understand that you are under oath?</p> <p>15 A. Yes.</p> <p>16 Q. And that the testimony that you provide today</p> <p>17 in this deposition is as if you were sitting in court</p> <p>18 giving that testimony to a Judge? Do you understand</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Is there anything today that would</p> <p>22 prevent you from giving me your full attention and</p> <p>23 responding accurately? For example, are you ill, or are</p> <p>24 you taking any medication that makes your head fuzzy?</p> <p>25 Is there anything that would prevent you from</p>	<p style="text-align: right;">Page 13</p> <p>1 Do you understand that instruction?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Thank you. If you don't understand a</p> <p>4 question, will you please ask me to rephrase it or</p> <p>5 repeat it.</p> <p>6 A. Okay.</p> <p>7 Q. All right. So I want to make sure if you give</p> <p>8 me an answer, that you have a good understanding of what</p> <p>9 I'm asking. Okay?</p> <p>10 A. Okay.</p> <p>11 Q. And then, finally, I might use some terms</p> <p>12 interchangeably. So, for example, if I use the term</p> <p>13 "Hispanic" or "Latino," will you understand those two</p> <p>14 terms to mean the same thing for the purpose of this</p> <p>15 deposition?</p> <p>16 A. Yes.</p> <p>17 Q. And if I use the term "limited English</p> <p>18 proficient," will you understand, for the purpose of</p> <p>19 this deposition, that I mean that it is a person for</p> <p>20 whom English is not their primary language and they have</p> <p>21 difficulty communicating in English?</p> <p>22 A. Okay. Yes.</p> <p>23 Q. All right. And then if I use the term "ABBM,"</p> <p>24 do you understand that to mean application for ballot by</p> <p>25 mail, or is that not a term you're familiar with?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. In-person early voting, in-person election day</p> <p>2 and then other, which includes mail ballot and</p> <p>3 provisionals.</p> <p>4 Q. Okay. And does that have just data for 2022?</p> <p>5 A. '22, 2018 and 2014.</p> <p>6 Q. Okay.</p> <p>7 A. Yeah.</p> <p>8 Q. Thank you. And later on, when we're on a</p> <p>9 break, I'll ask your lawyers if that's been produced to</p> <p>10 us. And if it hasn't been produced to us, I'll ask to</p> <p>11 take a copy of that. Okay?</p> <p>12 A. Okay.</p> <p>13 Q. And then I'll also ask you some questions about</p> <p>14 it, too.</p> <p>15 A. Okay.</p> <p>16 Q. Okay?</p> <p>17 MS. PERALES: I'd like to mark this</p> <p>18 Exhibit 1.</p> <p>19 (Deposition Exhibit Number 1 marked.)</p> <p>20 THE REPORTER: Would you like me to hand</p> <p>21 it to him?</p> <p>22 MS. PERALES: Yes, please.</p> <p>23 THE REPORTER: Okay.</p> <p>24 MS. PERALES: My arms are not long enough.</p> <p>25 (Document handed to the witness and Counsel.)</p>	<p style="text-align: right;">Page 20</p> <p>1 (indicating) from your attorneys at Dallas County.</p> <p>2 A. Okay.</p> <p>3 Q. And do you see --</p> <p>4 A. Do I need to hold it up or -- so that --</p> <p>5 Q. No.</p> <p>6 A. -- everybody -- oh.</p> <p>7 Q. It's okay --</p> <p>8 A. Okay.</p> <p>9 Q. -- but it's very kind of you to offer.</p> <p>10 A. Okay.</p> <p>11 Q. Do you see that your name is listed on here, on</p> <p>12 the far right column (indicating) next to certain</p> <p>13 topics?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And are you prepared to speak on those</p> <p>16 topics that your name is associated with?</p> <p>17 A. Yes.</p> <p>18 Q. Now, do you understand that because you are</p> <p>19 designated on certain topics, the answers that you give</p> <p>20 are on behalf of the Dallas County Elections Department?</p> <p>21 A. Yes.</p> <p>22 Q. Tell me your current job title.</p> <p>23 A. Voter Registration Manager.</p> <p>24 Q. Okay. How long have you held that position?</p> <p>25 A. 11 years.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. Mr. Lopez, I have handed you what has been --</p> <p>2 or you -- you have received what has been marked Exhibit</p> <p>3 1 for this deposition.</p> <p>4 Do you recognize this document?</p> <p>5 A. I think I have seen it. I haven't gone through</p> <p>6 it; but I have seen it, yes.</p> <p>7 Q. Okay. Do you understand that you're testifying</p> <p>8 today in response to this Notice of Deposition?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And if you'll turn with me to Page 9, do</p> <p>11 you see up at the top it's marked Exhibit A?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And then if you just look through it,</p> <p>14 there are some definitions and then there are some</p> <p>15 topics, some numbered topics that begin on Page 12, but</p> <p>16 I will -- yeah. They begin on Page 12.</p> <p>17 Do you see those there?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 MS. PERALES: Can we mark this Number 2?</p> <p>21 (Deposition Exhibit Number 2 marked.)</p> <p>22 (Document handed to the witness and Counsel.)</p> <p>23 Q. And Mr. Lopez, you -- you have been handed what</p> <p>24 has been marked Deposition Exhibit Number 2, and I'll</p> <p>25 represent to you that this is a chart that we received</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And what was your job before you became the</p> <p>2 Voter Registration Manager?</p> <p>3 A. I worked with the City of Dallas.</p> <p>4 Q. And what were you doing there?</p> <p>5 A. I was a supervisor at one of the local rec</p> <p>6 centers.</p> <p>7 Q. And where was that rec center?</p> <p>8 A. At Harry Stone Recreation Center.</p> <p>9 Q. And what neighborhood is that in?</p> <p>10 A. Kind of far East Dallas.</p> <p>11 Q. Okay. And so you went from that position with</p> <p>12 the City of Dallas to become the Voter Registration</p> <p>13 Manager --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- for Dallas --</p> <p>16 A. Yes.</p> <p>17 Q. -- County?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Are you from Dallas originally?</p> <p>20 A. Born and raised, yes.</p> <p>21 Q. Where did you go to high school?</p> <p>22 A. I lived in Houston about five years, so I did</p> <p>23 my whole high school career down in Houston at Clear</p> <p>24 Creek High School.</p> <p>25 Q. Okay. Clear Creek.</p>

<p style="text-align: right;">Page 22</p> <p>1 A. And then I came back to Dallas.</p> <p>2 Q. Then you came back here?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Did you do any schooling after high school?</p> <p>5 A. Yes. I went to Mountain View College for a few</p> <p>6 years and then I transferred over to Dallas Baptist</p> <p>7 University and that's where I graduated.</p> <p>8 Q. Okay. And you got a bachelor's degree?</p> <p>9 A. Yes.</p> <p>10 Q. Have you done any schooling after that?</p> <p>11 A. No.</p> <p>12 Q. So, with respect to your current position as</p> <p>13 the Voter Registration Manager, what are your duties?</p> <p>14 A. I oversee the voter registration area, and we</p> <p>15 maintain voter lists, add and update voter information,</p> <p>16 whether they're changing their address, changing their</p> <p>17 name. We work with the Secretary of State, uploading</p> <p>18 files, downloading files, sending voter history over to</p> <p>19 the Secretary of State, working on mapping, you know,</p> <p>20 precincts and -- and stuff like that. So we just --</p> <p>21 just maintain all the voters, 1.4 million voters in</p> <p>22 Dallas County.</p> <p>23 Q. That's a lot of voters.</p> <p>24 A. Oh, yeah.</p> <p>25 Q. Earlier I was telling you that the Bexar County</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. -- I understand.</p> <p>2 Do you know how many voters in Dallas County</p> <p>3 you do not have either a driver's license number or the</p> <p>4 last four of the Social?</p> <p>5 A. It's -- I know 99.46 percent do have a driver's</p> <p>6 license or a Social on record. So about a half a</p> <p>7 percent of our -- our registered voters. I guess it</p> <p>8 would be close to 70,000.</p> <p>9 Q. Do you know how many people only have one</p> <p>10 number and not both numbers?</p> <p>11 A. 97.13 percent have at least one.</p> <p>12 Q. Have at least one?</p> <p>13 A. Uh-huh.</p> <p>14 Q. But do you -- can you tell me how many lack</p> <p>15 both numbers?</p> <p>16 A. Probably close to 70,000.</p> <p>17 Q. Okay. Yes. I asked that question --</p> <p>18 A. Yeah.</p> <p>19 Q. -- wrong. Let me try again.</p> <p>20 How many of your registered voters only have</p> <p>21 one number and not a second number?</p> <p>22 A. That would be -- I want to say -- well, because</p> <p>23 97 percent of them have either a Texas Driver's License</p> <p>24 or --</p> <p>25 Q. Uh-huh.</p>
<p style="text-align: right;">Page 23</p> <p>1 Elections Administrator refers to the big counties as</p> <p>2 "the big boys." Have you heard that before?</p> <p>3 A. Yes.</p> <p>4 Q. Yeah. Dallas County is one of the big boys,</p> <p>5 isn't it?</p> <p>6 A. Oh, yeah.</p> <p>7 Q. Yeah. Are you familiar with the TEAM system?</p> <p>8 A. Yes.</p> <p>9 Q. Is Dallas County an online county or an offline</p> <p>10 county?</p> <p>11 A. Offline.</p> <p>12 Q. Do you know why Dallas County is an offline</p> <p>13 county?</p> <p>14 A. I think the larger counties, it would be too</p> <p>15 much for the State system to handle. So I guess about</p> <p>16 half the state, especially the larger ones, have their</p> <p>17 own VR database.</p> <p>18 Q. Okay. I'm going to ask these questions just --</p> <p>19 not because I'm going to go into them deeply with you.</p> <p>20 I just want to make sure I understand what you know --</p> <p>21 A. Okay.</p> <p>22 Q. -- about your relationship with the TEAM</p> <p>23 system. And like I said, I'm not going to go deep, but</p> <p>24 I just want to make sure --</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 25</p> <p>1 A. -- an ID.</p> <p>2 Q. Uh-huh.</p> <p>3 A. So, yeah, I'll have to look at that. I don't</p> <p>4 know that number off the top of my head.</p> <p>5 Q. Okay. And so what you -- just so you</p> <p>6 understand what I'm getting at, if you have a driver's</p> <p>7 license number for me --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- but you don't have my Social --</p> <p>10 A. Right.</p> <p>11 Q. -- or you have my Social, but you don't have my</p> <p>12 driver's license.</p> <p>13 So people for whom you have one number filled</p> <p>14 in, but you don't have a second number for them, you</p> <p>15 would have to go back and try to see how many that were?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Okay.</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And now with respect to TEAM, do you</p> <p>20 have knowledge of whether you received an update from</p> <p>21 TEAM -- "you," meaning Dallas County -- received an</p> <p>22 update for TEAM sometime around December or January that</p> <p>23 was from the Secretary of State that went into your</p> <p>24 system that had additional ID numbers for your</p> <p>25 registered voters?</p>

<p style="text-align: right;">Page 26</p> <p>1 A. Not in December and January. On February 22nd, 2 we received an import that contained driver's license or 3 Socials. And our vendor matched those up, and whatever 4 voters didn't have a driver's license or Social, they 5 applied it to their record. 6 Q. And you were able to bring that import in; you 7 didn't have any problems with your data coming in? 8 A. No. 9 Q. And that was on February 22nd? 10 A. Yes. 11 Q. Okay. Okay. Okay. I'm going to ask you some 12 questions about the period 2018 to the present. 13 A. Okay. 14 Q. First, let me ask you whether, in 2018, you 15 used what are sometimes called vote centers or 16 countywide polling places. Let's just start with for 17 early voting. 18 A. Uh-huh. 19 Q. Did you use vote centers or countywide polling 20 places for early voting since 2018? 21 A. Yes. Where anybody can vote at any early 22 voting location, yes. 23 Q. Yes. Do you have a phrase that you use for 24 that here in Dallas? 25 A. Well, before we went to vote centers for</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. -- before they start closing precinct-based 2 polling places. 3 Is that an approach that Dallas County is 4 taking place, as well; or have you started closing 5 precinct-based in-person polls systematically? 6 A. Right. We don't have any precinct-based 7 anymore. We just went straight to vote centers. 8 Q. Okay. So if there's a particular elementary 9 school, for example, that people know that they -- that 10 they historically would vote at, from that 11 neighborhood -- let's say they would all go to that 12 elementary school -- have you started closing those 13 types of, you know, polling places and redirecting 14 (indicating) voters to the vote centers that might be 15 fewer? 16 A. That is currently happening right now. In 17 2019, they decided to keep all polling places open for 18 vote centers. 19 Q. Uh-huh. 20 A. So right now, they are in the process of doing 21 that -- 22 Q. Okay. 23 A. -- yes. 24 Q. Got it. Thank you. And so for the March 1st, 25 2022, primary, all your polling places were vote</p>
<p style="text-align: right;">Page 27</p> <p>1 election day, we just called it early voting, yeah. So, 2 yeah. 3 Q. Okay. And so you've mentioned vote centers for 4 election day. 5 A. Uh-huh. 6 Q. Do you use vote centers for election day now? 7 A. Yes. 8 Q. And can you tell me when you started using vote 9 centers for election day? 10 A. 2019. 11 Q. Okay. Have you closed any precinct polling 12 places since you implemented vote centers on election 13 day? 14 A. Me, personally (pointing), like -- 15 Q. Dallas County. 16 A. Oh, Dallas County? 17 Q. Yeah. 18 A. Yes. Each election, polling places sometimes 19 have to be closed, yes. 20 Q. So I know that, for some counties, they are 21 bringing in vote centers for election day; but they 22 haven't yet started closing or eliminating (indicating) 23 precinct-based polling places. They are trying to, I 24 think, get the vote center thing in there -- 25 A. Oh, okay.</p>	<p style="text-align: right;">Page 29</p> <p>1 centers; is that correct? 2 A. Correct. 3 Q. And you expect to do that, as well, for the 4 November 2022 general election? 5 A. Yes. 6 Q. Okay. In -- do you recall -- do you recall the 7 hours that you had polling places open in 2018? 8 A. No. I'd have to look at the time, but it's -- 9 it's pretty standard. Usually the first week's 8:00 to 10 5:00; second week, 7:00 to 7:00 and then Saturdays, 11 usually 7:00 to 7:00 and Sundays 12:00 to 6:00. It's 12 pretty -- that's our pretty standard hours each 13 election. 14 Q. Uh-huh. Okay. And did you do anything with 15 extended hours for voting in 2020? 16 A. They extended an extra week of early voting -- 17 Q. Uh-huh. 18 A. -- so we had an extra week, and every day was 19 7:00 to 7:00. So they extended -- instead of 8:00 to 20 5:00, it was 7:00 to 7:00 -- 21 Q. Okay. 22 A. -- with the exception of Sunday, which was 23 still 12:00 to 6:00. 24 Q. Okay. So for -- we were just talking about 25 2020 --</p>

<p style="text-align: right;">Page 30</p> <p>1 A. (Witness moves head up and down.)</p> <p>2 Q. -- when you did that.</p> <p>3 Have you then, with respect to 2022, for the</p> <p>4 March primary, did you keep those same hours as you had</p> <p>5 in 2020; or did you make any adjustments?</p> <p>6 A. No. Went back to our standard 8:00 to 5:00,</p> <p>7 7:00 to 7:00. We did extend the last day of early</p> <p>8 voting for the primary to 10:00 o'clock.</p> <p>9 Q. To 10:00 p.m.?</p> <p>10 A. Uh-huh.</p> <p>11 Q. And that was --</p> <p>12 A. I believe it was the 25th of February. I</p> <p>13 believe that was the last day of early voting.</p> <p>14 Q. And why did you extend voting until 10:00 p.m.</p> <p>15 on February 25th, 2022?</p> <p>16 A. It was ordered by the County Judge. We kind of</p> <p>17 found out at the last minute. They let us know, Hey</p> <p>18 we're staying opened till 10:00.</p> <p>19 And I don't even know if they advertised it or</p> <p>20 whatever. But yeah, we found out at the last minute, so</p> <p>21 we just kept the polls open till 10:00.</p> <p>22 Q. You asked the poll workers to stay and --</p> <p>23 A. Yeah. We had to send, like, a mass -- our</p> <p>24 ePollbook has a messaging. So we sent a mass message,</p> <p>25 and we were also calling them, too, so -- to let them</p>	<p style="text-align: right;">Page 32</p> <p>1 duties that are related to the actual casting of</p> <p>2 ballots; is that right?</p> <p>3 A. No. I stick to voter registration. So we</p> <p>4 help -- like, if a judge calls, has a voter that's</p> <p>5 having an issue, they can't find them in the poll book,</p> <p>6 we look them up and help them. Like, during early</p> <p>7 voting, we offer limited ballot process. Election Day,</p> <p>8 they offer the provisional process, so we help them,</p> <p>9 help the judge and the voter through that.</p> <p>10 Q. Okay. And then, as the Voter Registration</p> <p>11 Manager, were you involved in trying to process, for</p> <p>12 March 2022, people's applications for ballot by mail and</p> <p>13 mail ballots to the extent that there was this new</p> <p>14 requirement to match the ID number, that was being</p> <p>15 provided, to the voter?</p> <p>16 A. No.</p> <p>17 Q. You weren't doing any of that matching work?</p> <p>18 A. No. If they -- if the ballot by mail</p> <p>19 department gave us a form, we -- like, because it had a</p> <p>20 Statement of Residence, also --</p> <p>21 Q. Uh-huh.</p> <p>22 A. -- on the form. So if they filled out a form,</p> <p>23 they would give it to us and we would update their</p> <p>24 information.</p> <p>25 Q. Okay. So that's if you had the person at the</p>
<p style="text-align: right;">Page 31</p> <p>1 know.</p> <p>2 Q. Okay. And do you know if staying open until</p> <p>3 10:00 p.m. on February 25th afforded voters in Dallas</p> <p>4 County an additional opportunity to go to the polls and</p> <p>5 cast their ballot that day?</p> <p>6 MS. HUNKER: Objection, form.</p> <p>7 A. It did, yes.</p> <p>8 Q. (By Ms. Perales) Do you know or do you have a</p> <p>9 sense of why the County Judge ordered you to stay open</p> <p>10 till 10:00 p.m. on the last day?</p> <p>11 A. I do not.</p> <p>12 Q. Okay.</p> <p>13 A. Can't recall.</p> <p>14 Q. All right. Do you know if there were voters</p> <p>15 who were trying to vote mail ballots who were then</p> <p>16 coming to the polls on that last day, including up till</p> <p>17 10:00 p.m., to -- to hand drop-off their mail ballots?</p> <p>18 MS. HUNKER: Objection to form.</p> <p>19 A. I don't know.</p> <p>20 Q. (By Ms. Perales) Okay. So I have a question</p> <p>21 about your involvement in kind of voting during the</p> <p>22 election days when people are voting.</p> <p>23 You're the Voter Registration Manager --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- but it sounds like you've also got some</p>	<p style="text-align: right;">Page 33</p> <p>1 wrong address.</p> <p>2 Do you have any knowledge, in March of 2022,</p> <p>3 this most recent primary election, of voters having to</p> <p>4 put an ID number, either driver's license or last four</p> <p>5 of the Social, on their application for ballot by mail</p> <p>6 or on the carrier envelope?</p> <p>7 A. Yes, I knew about that.</p> <p>8 Q. Okay.</p> <p>9 A. Yes.</p> <p>10 Q. Were you involved in doing any of the checking</p> <p>11 of those numbers or trying to match those numbers to the</p> <p>12 voter roll?</p> <p>13 A. No, I wasn't.</p> <p>14 Q. Okay. You've been designated to talk about</p> <p>15 Dallas County's experience with voters who vote with</p> <p>16 assistance in person from 2018 to the present.</p> <p>17 Do you have knowledge about Dallas County</p> <p>18 Election's experience with voters who come with another</p> <p>19 person to vote in person, so at the polls?</p> <p>20 A. When we were preparing, they asked if we can</p> <p>21 pull statistics. And so I went into our ePollbook, and</p> <p>22 we -- we can. We do track that with our new ePollbook,</p> <p>23 our current one. Before, we weren't tracking it; but I</p> <p>24 was able to pull statistics to show how many people</p> <p>25 requested assistance.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. Uh-huh. And I just learned yesterday that the 2 ePollbook can be handy for figuring that information 3 out. 4 A. Yeah. 5 Q. So a couple of questions. When you say that 6 you didn't track it before, what does "before" mean? 7 A. Before we implement our current ePollbook, 8 which is before 2020. 9 Q. Okay. But for -- at least for 2020 onward, you 10 can run a report that tells you how many voters voted at 11 the polling place with assistance; is that right? 12 A. Yes. 13 Q. And the poll book, the ePollbook is used in the 14 polling places where the people come personally to vote; 15 is that right? 16 A. Yes. 17 Q. Would you have that same information for who 18 voted with assistance by mail ballot, where the assistor 19 signs on the mail ballot -- 20 A. I wouldn't have that, no. 21 Q. Okay. Did you run any reports about how many 22 voters used assistants in either this most recent 2022 23 or prior elections? 24 A. I did. I didn't -- I -- I ran the reports to 25 get the numbers. I wrote the numbers down, but I don't</p>	<p style="text-align: right;">Page 36</p> <p>1 A. All right. 2 Q. So since it sounds like you've already run a 3 few reports, so you're familiar with how to run these 4 reports, is that right, on the ePollbook? 5 A. Yes. 6 Q. Okay. Can you also get the names of the 7 voters? 8 A. Yes. The names are on the report. 9 Q. Okay. Okay. So, for example, you could see 10 which voters have a Spanish surname, like Lopez or 11 Perales versus another kind of name? 12 A. Yes. 13 Q. Okay. What is the software that you're using 14 now that allows you to run the report? 15 A. It's called ExpressPoll Connect, and the vendor 16 is ES&S, which is Election Systems & Software. 17 Q. Have you ever assisted a voter to vote? Have 18 you ever gone with someone and helped them? 19 A. I have not. 20 Q. Okay. Do you have anyone in your family here 21 in Dallas County who uses assistants to vote? 22 A. No. 23 Q. No viejitos? 24 A. No. 25 Q. Okay. Does Dallas County -- or from January of</p>
<p style="text-align: right;">Page 35</p> <p>1 have the reports. 2 Q. Okay. So I'm going to ask you for the numbers 3 so you can -- 4 A. Okay. 5 Q. -- tell me them, and then I'm going to ask for 6 the reports, themselves, to be produced because I 7 believe that information is responsive to at least one 8 of our Requests for Production. 9 A. Okay. 10 Q. Okay. So tell me the numbers that you have. 11 A. For this recent primary election, 2022, there 12 was 752 voters requested assistance. For November 2021, 13 there was a hundred and thirty. For June 2021, we had 14 88. For May 2021, we had 228. And for November 2020, 15 we had 4,335. And we had a small run-off election 16 December '21. We only had one. 17 Q. That must have been a very small run-off. 18 A. Yeah. 19 Q. December of 2021. I'm just trying to think of 20 what office would have been in a run-off in December of 21 2021, but it must -- 22 A. I -- 23 Q. -- must have been something special. 24 A. Yeah. 25 Q. Okay. Thank you.</p>	<p style="text-align: right;">Page 37</p> <p>1 2018 until now, has Dallas County done any kind of voter 2 registration or voter outreach to specific communities 3 within Dallas County, either aiming the outreach at 4 particular neighborhoods or particular populations, 5 either voter registration outreach or voter outreach? 6 A. Not specifically. Anytime we've gone out to do 7 voter drives, we go to high schools, we go to colleges, 8 college campuses. If somebody invites us because they 9 are having a big event -- it could be in the southern 10 sector, west side, east, we attend those. And so we 11 don't specifically target one area over the other. 12 Q. Okay. Have you ever done any special outreach, 13 for either registration or voting, to disabled folks in 14 the community, any special disability outreach? 15 A. No. 16 Q. Let's talk about immigrants to the United 17 States. 18 Do you do any voter registration drives outside 19 of naturalization ceremonies? 20 A. No. We do inside. We -- we go inside to the 21 naturalization ceremony. 22 Q. Okay. So -- 23 A. -- so... 24 Q. -- somewhere in the building, you set up a 25 table. Is that it?</p>

<p style="text-align: right;">Page 38</p> <p>1 A. Yes. We used to, in the past, me and my staff, 2 we'd go to -- I mean, a couple of times a week 3 sometimes -- and we would register newly citizens. Now 4 we have an Outreach Coordinator that kind of handles 5 that. She was hired to do that, so she has volunteer 6 deputy registrars that go out to those locations now. 7 Q. Do you have any records on how many people you 8 have registered to vote in connection with 9 naturalization ceremonies? 10 A. I don't. 11 Q. Nowhere do you -- do you have, like, something 12 in your office that says, okay, for this past year, this 13 is how many people we registered outside of 14 naturalization ceremonies, just to -- 15 A. Right. 16 Q. -- show like how much work you're doing? 17 A. Right. Maybe our Outreach Coordinator would. 18 I just wouldn't have that right now. 19 Q. Okay. Do you do any outreach for voter 20 registration or voting in languages other than English? 21 A. Spanish, yes. And we just got a third 22 language, so I'm sure we'll be doing Vietnamese 23 outreach, as well. 24 Q. You're newly covered for Vietnamese, right? 25 A. Yes.</p>	<p style="text-align: right;">Page 40</p> <p>1 patience with us today. You are not done, but you 2 are done with me, and I'm going to pass you along to 3 Mr. White here. But I did want to note for the record 4 that, based on our discussion, that the ExpressPoll Pad 5 Connect software can run reports on how many voters 6 voted in person with an assistor, that we believe that 7 that information is responsive to some of our request 8 for production. And we are happy to continue this 9 conversation, but I want to note for the record that we 10 believe that the reports that Mr. Lopez is referencing 11 is something that we've asked for in the case, and that 12 Mr. Lopez also suggested there might be records 13 maintained by the Outreach Coordinator on voters -- 14 voter outreach at naturalization ceremonies, which may 15 also be responsive to our discovery requests. And I'd 16 be happy to sort of pinpoint that for you at a later 17 point, but I want to make sure that I get that on the 18 record before I pass the witness. 19 MR. STOOL: Understood. 20 MS. PERALES: And now I pass the witness. 21 MR. STOOL: All right. 22 MS. PERALES: And we're just going to -- 23 MR. WHITE: Yeah, I'll -- 24 MS. PERALES: -- hand this microphone to 25 Mr. White.</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. And what's your other language? You said it's 2 the third, so Spanish, Vietnamese -- 3 A. And English. 4 Q. Oh. Okay. Have you ever done any voter 5 registration or voter outreach in minority neighborhoods 6 (indicating) specifically, or that just happens 7 naturally as a result of your regular work? 8 A. Right. It happens -- 9 MS. HUNKER: Objection, form. 10 A. -- naturally. I mean, if the high school or 11 the college is in a minority area, I mean, yes, we're -- 12 we're there. 13 Q. (By Ms. Perales) Okay. Do you -- do you have 14 any involvement in where you choose to locate polling 15 places for voting? 16 A. I don't. 17 MS. PERALES: I would like to take a 18 couple of minutes off the record, if I could. 19 THE VIDEOGRAPHER: Okay. We're going off 20 the record. The time is 11:29 a.m. 21 (Break taken.) 22 THE VIDEOGRAPHER: Okay. We are back on 23 the record. The time is 11:33 a.m. 24 MS. PERALES: Okay. Before I pass the 25 witness, Mr. Lopez, I want to thank you for your</p>	<p style="text-align: right;">Page 41</p> <p>1 EXAMINATION 2 BY MR. WHITE: 3 Q. Mr. Lopez, how are you? 4 A. Doing good. 5 Q. I just have a couple of questions about your 6 testimony earlier about extended hours in voting. 7 And you testified earlier that polling places 8 were open until 10:00 p.m. on February 25th, 2022 -- 9 A. Yes. 10 Q. -- is that right? 11 And was that because of a Court Order? 12 A. Yes. 13 Q. And do you remember what the reason was for the 14 judge ordering the extended voting hours? 15 A. I don't. 16 Q. Okay. And how late were polling places 17 supposed to stay open prior to that Court Order? 18 A. 7:00. 19 Q. Until 7:00 p.m.? 20 A. Well, If there's no voters in line at 7:00 21 o'clock. But if there's voters, they got to vote. 22 Q. Were you concerned that having polling places 23 open until 10:00 p.m. on that day would lead to a voter 24 fraud? 25 A. No.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. Why not?</p> <p>2 MS. HUNKER: Objection, form.</p> <p>3 A. I have no reason to believe that, no.</p> <p>4 Q. (By Mr. White) Was anyone in your office</p> <p>5 concerned that having the polling places open until</p> <p>6 10:00 p.m. would lead to voter fraud?</p> <p>7 MS. HUNKER: Objection, form.</p> <p>8 A. I can't speak for them, no.</p> <p>9 Q. (By Mr. White) Did you hear anyone in your</p> <p>10 office express concerns to you that these extended hours</p> <p>11 would lead to voter fraud?</p> <p>12 A. No.</p> <p>13 Q. Did your office receive any complaints from</p> <p>14 voters that these extended hours would lead to voter</p> <p>15 fraud?</p> <p>16 MS. HUNKER: Objection, form.</p> <p>17 A. I don't know if we received any complaints.</p> <p>18 Q. (By Mr. White) Are you aware of any voter</p> <p>19 fraud that occurred during these extended hours on</p> <p>20 February 25th?</p> <p>21 A. I'm not aware of any.</p> <p>22 Q. Do you know how many voters showed up to vote</p> <p>23 during these extended hours on February 25th?</p> <p>24 A. I do not have those numbers.</p> <p>25 Q. Okay. Do you know if there were particular</p>	<p style="text-align: right;">Page 44</p> <p>1 witness, I guess, to anyone on the Zoom who wants to ask</p> <p>2 questions remotely --</p> <p>3 MS. PERALES: Plaintiffs' side on the</p> <p>4 Zoom.</p> <p>5 MR. WHITE: -- on the Plaintiffs' side.</p> <p>6 MS. PERALES: So I'm not tethered. Just</p> <p>7 give me a second to come down the table.</p> <p>8 MS. BENDER: The United States has no</p> <p>9 questions at this time. Thank you.</p> <p>10 MS. PERALES: Thank you. This is Nina</p> <p>11 Perales talking to you now. Is there anybody on the</p> <p>12 Zoom who has questions for the witness from the</p> <p>13 Plaintiffs' side?</p> <p>14 MS. CAI: No questions from us at this</p> <p>15 time. Thank you.</p> <p>16 THE REPORTER: And can you identify?</p> <p>17 MS. PERALES: Yeah. And just let me know</p> <p>18 who said "No questions for the United States."</p> <p>19 MS. BENDER: This is Brady Bender.</p> <p>20 MS. PERALES: Brady Bender.</p> <p>21 THE REPORTER: Thank you.</p> <p>22 MS. BENDER: Yes.</p> <p>23 MS. PERALES: Thank you so much. It just</p> <p>24 sounds like --</p> <p>25 MS. BENDER: Thank you.</p>
<p style="text-align: right;">Page 43</p> <p>1 precincts in Dallas County where voters were more likely</p> <p>2 to show up during these extended hours on February 25th?</p> <p>3 A. I don't --</p> <p>4 MS. HUNKER: Objection, form.</p> <p>5 A. -- know that.</p> <p>6 Q. Okay.</p> <p>7 THE REPORTER: I'm sorry. Okay. Thank</p> <p>8 you.</p> <p>9 Q. (By Mr. White) As a general matter, are there</p> <p>10 voters in Dallas County who struggle to make it to the</p> <p>11 polls during normal voting hours?</p> <p>12 MS. HUNKER: Objection, form.</p> <p>13 A. Repeat the question.</p> <p>14 Q. As a general matter, are there voters in Dallas</p> <p>15 who struggle to make it to the polls during normal</p> <p>16 voting hours?</p> <p>17 MS. HUNKER: Objection, form.</p> <p>18 A. I don't know.</p> <p>19 MR. WHITE: Okay. I have no further</p> <p>20 questions.</p> <p>21 THE REPORTER: Just a --</p> <p>22 MR. WHITE: And I will pass the --</p> <p>23 THE REPORTER: Just a second. Okay.</p> <p>24 Thank you.</p> <p>25 MR. WHITE: Okay. Well, I will pass the</p>	<p style="text-align: right;">Page 45</p> <p>1 MS. PERALES: -- none of the other</p> <p>2 Plaintiffs have questions. So I think it's coming</p> <p>3 around the table to Ms. Hunker.</p> <p>4 EXAMINATION</p> <p>5 BY MS. HUNKER:</p> <p>6 Q. All right. Hello, Mr. Lopez.</p> <p>7 A. Hello.</p> <p>8 Q. It's good seeing you again.</p> <p>9 A. You, too.</p> <p>10 Q. So I have only a handful of questions for you.</p> <p>11 To give you a precursor, my questions are mostly in</p> <p>12 response to what the Plaintiffs have asked, and so</p> <p>13 there's going to be a little bit of jumping around.</p> <p>14 If at any point you get confused by my</p> <p>15 switching subject or I'm not clear, can you please let</p> <p>16 me know? I am happy to lay either more foundation or to</p> <p>17 rephrase the question.</p> <p>18 A. Okay.</p> <p>19 Q. Excellent. So you had spoken about the</p> <p>20 extended hours on February 25th, 2022; is that correct?</p> <p>21 A. Yes.</p> <p>22 Q. And the extended hours was based off of</p> <p>23 decision from a Court; is that correct?</p> <p>24 A. Yes. The County Judge, yes.</p> <p>25 Q. So when you say "a court" and you say "the</p>

<p style="text-align: right;">Page 46</p> <p>1 County Judge," are you referring to a judicial action,</p> <p>2 or are you referring to the County Judge acting in his</p> <p>3 executive capacity in Dallas County?</p> <p>4 A. The County Judge from the Commissioners Court.</p> <p>5 Q. Okay. So you're referring to the Commissioners</p> <p>6 Court made the decision to have extended hours?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So this was not imposed on Dallas</p> <p>9 County. This was a decision that Dallas County made,</p> <p>10 itself; is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. And they did not communicate why they asked for</p> <p>13 extended hours on February 25th?</p> <p>14 A. They may have. I just don't know that answer.</p> <p>15 Q. And so let me break that question down twice,</p> <p>16 just to -- to clarify.</p> <p>17 You were not aware of the reasons they</p> <p>18 requested extended hours at all during that election; is</p> <p>19 that correct?</p> <p>20 A. Correct.</p> <p>21 Q. And you do not know why they requested extended</p> <p>22 hours on the specific day of February 25th; is that</p> <p>23 correct?</p> <p>24 A. Correct.</p> <p>25 Q. When you extended hours from -- ending at 7:00</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes.</p> <p>2 Q. And you had also discussed the process of</p> <p>3 eliminating precincts; is that right?</p> <p>4 A. Yes.</p> <p>5 Q. Will precincts be closed in November of 2020</p> <p>6 based on the -- let me rephrase that question because I</p> <p>7 used the wrong year.</p> <p>8 A. Uh-huh.</p> <p>9 Q. Will precincts be closed in November 2022 based</p> <p>10 on the switch to countywide voting in 2019?</p> <p>11 A. That is a plan, to close --</p> <p>12 Q. Okay.</p> <p>13 A. -- those centers, yes.</p> <p>14 Q. Do you know how many?</p> <p>15 A. I don't have that number yet.</p> <p>16 Q. Do you know how many early voting locations</p> <p>17 were available for voters in November 2018?</p> <p>18 A. I don't know that number.</p> <p>19 Q. Okay. What about November 2020?</p> <p>20 A. I don't have that number either.</p> <p>21 Q. Okay. And you wouldn't know the amount of</p> <p>22 election day locations on either of those years, would</p> <p>23 you?</p> <p>24 A. No, not off the top of my head. No.</p> <p>25 Q. Do you know if they'll be -- let's start with</p>
<p style="text-align: right;">Page 47</p> <p>1 moving it to 10:00 p.m., were there any logistical</p> <p>2 challenges that you faced with that?</p> <p>3 A. Not that I'm aware of.</p> <p>4 Q. And when you're answering this question, are</p> <p>5 you speaking about your specific subdivision within the</p> <p>6 Election Administrator's Office, or are you talking</p> <p>7 about the Election Administrators as a whole?</p> <p>8 A. As a whole.</p> <p>9 Q. Okay. And so did you have problems, for</p> <p>10 example, securing additional poll watcher- -- poll</p> <p>11 workers?</p> <p>12 A. Not that I'm aware of.</p> <p>13 Q. And did you have any problem securing any</p> <p>14 election judges?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Did you consider hosting 24-hour voting</p> <p>17 locations during November 2020?</p> <p>18 A. No.</p> <p>19 Q. And do you know if your office considered</p> <p>20 hosting extended hours during November 2020 at all?</p> <p>21 A. Not that I'm aware of.</p> <p>22 Q. So Ms. Perales had mentioned county-wide</p> <p>23 voting, and you said you had -- Dallas County started</p> <p>24 county-wide voting on Election Day in 2019; is that</p> <p>25 right?</p>	<p style="text-align: right;">Page 49</p> <p>1 early voting -- if it will be the same number or</p> <p>2 approximately the same number of polling locations in</p> <p>3 the early voting period in November 2022 as there was in</p> <p>4 November 2018?</p> <p>5 A. Approximately, yes, it should be close.</p> <p>6 Q. Okay. And I'm going to ask the same question</p> <p>7 with respect to November 2020.</p> <p>8 Do you know if this might be approximately the</p> <p>9 same number of locations in 2022, November, as there</p> <p>10 were in November 2020?</p> <p>11 A. Approximately, yes, should be close.</p> <p>12 Q. And I'm going to ask the same question with</p> <p>13 respect to Election Day.</p> <p>14 To your knowledge, are there going to be</p> <p>15 approximately the same number of polling locations on</p> <p>16 Election Day in November 2022 as there were in November</p> <p>17 2020?</p> <p>18 A. No. It will be less.</p> <p>19 Q. And do you know by how much, roughly?</p> <p>20 A. I don't.</p> <p>21 Q. And what about based on 2018? Would there be</p> <p>22 approximately the same number of polling locations in</p> <p>23 November 2022 as there would be -- as there were in</p> <p>24 '20 -- November 2020? Let me rephrase that question</p> <p>25 because I completely messed up while stating it.</p>

<p style="text-align: right;">Page 50</p> <p>1 Do you know if it will be approximately the</p> <p>2 same number of polling locations in November 2022 as</p> <p>3 there were in November 2018?</p> <p>4 A. It will be less.</p> <p>5 Q. It will be less.</p> <p>6 A. Yes.</p> <p>7 Q. And what was the reason for the decline?</p> <p>8 A. It was -- in 2019, they decided to keep all of</p> <p>9 them open, when we went to vote centers. They wanted to</p> <p>10 keep every single precinct open. And then they said</p> <p>11 after a two-year cycle, they would go down. They</p> <p>12 would -- the Commissioners Court would decide on</p> <p>13 decreasing the number of locations to save on cost and</p> <p>14 number of poll workers --</p> <p>15 Q. Uh-huh.</p> <p>16 A. -- so...</p> <p>17 Q. And did they have voter input with this, or did</p> <p>18 they open the -- the decision-making process to voter</p> <p>19 input?</p> <p>20 A. They opened it up.</p> <p>21 Q. And so voters were able to voice their concerns</p> <p>22 or their support for the initiative?</p> <p>23 A. They have.</p> <p>24 MR. WHITE: Objection to form.</p> <p>25 A. They have -- they put a committee together,</p>	<p style="text-align: right;">Page 52</p> <p>1 bring my grandmother in to vote and she's in a</p> <p>2 wheelchair and I helped push her to the polling</p> <p>3 location, but then she voted on her own, would she --</p> <p>4 would I have had to sign the poll book?</p> <p>5 MR. WHITE: Objection --</p> <p>6 MS. PERALES: Objection --</p> <p>7 MR. WHITE: -- form.</p> <p>8 A. No.</p> <p>9 THE REPORTER: I'm sorry. Thank you.</p> <p>10 Q. (By Ms. Hunker) And so only certain types of</p> <p>11 assistance are marked on the poll book; is that correct?</p> <p>12 MS. PERALES: Objec- --</p> <p>13 A. Voting assistance.</p> <p>14 MS. PERALES: -- -tion --</p> <p>15 Q. (By Ms. Hunker) Voting assistance.</p> <p>16 MS. PERALES: -- this is --</p> <p>17 A. Yes.</p> <p>18 THE REPORTER: Sorry.</p> <p>19 MS. PERALES: Objection -- hold up --</p> <p>20 THE WITNESS: Okay.</p> <p>21 MS. PERALES: -- for one second --</p> <p>22 THE WITNESS: Okay.</p> <p>23 MS. PERALES: -- if you would.</p> <p>24 First, objection, form; second, I want to</p> <p>25 object that this is outside the scope of the designated</p>
<p style="text-align: right;">Page 51</p> <p>1 Vote Center Advisory Committee.</p> <p>2 Q. (By Ms. Hunker) Do you know if any of the vote</p> <p>3 center committees findings or discussions are online?</p> <p>4 A. I don't know if they are online.</p> <p>5 Q. Now, you had also discussed the ePad or the --</p> <p>6 where you sign in on -- when in-person voting. And I</p> <p>7 believe you said that that picks up who has requested</p> <p>8 assistance, all for the last few years; is that right?</p> <p>9 A. Yes.</p> <p>10 Q. How does that work exactly?</p> <p>11 A. The ePollbook has -- you can sign on the</p> <p>12 ePollbook, so there's a oath on there if somebody</p> <p>13 requests assistance, and then the person giving the</p> <p>14 assistance signs the oath on there. And so when we do</p> <p>15 the report, even the signature comes on the report, as</p> <p>16 well.</p> <p>17 Q. Okay. And so when it comes to assistants, it's</p> <p>18 only picking up individuals who took the oath; is that</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. And so it's only taking individuals who assist</p> <p>22 with the actual marking of the ballot; is that correct?</p> <p>23 MS. PERALES: Objection, vague.</p> <p>24 A. The -- for the ballot-marking device, yes.</p> <p>25 Q. (By Ms. Hunker) So if, let's say, I were to</p>	<p style="text-align: right;">Page 53</p> <p>1 topic of this witness and possibly outside the scope of</p> <p>2 his knowledge as the Voter Registration Director.</p> <p>3 THE REPORTER: And I didn't hear your</p> <p>4 answer. Can you say your answer again? You just said a</p> <p>5 few words, I know, but I did not hear you.</p> <p>6 THE WITNESS: Yes.</p> <p>7 THE REPORTER: Thank you.</p> <p>8 Q. (By Ms. Hunker) And so let me ask the question</p> <p>9 again because I actually lost my place of thought.</p> <p>10 MS. HUNKER: And I would ask that we keep</p> <p>11 speaking objections to a minimum under local rules, 30,</p> <p>12 only because it does disrupt my thought process.</p> <p>13 MS. PERALES: And I will, however, be</p> <p>14 making the same objections again.</p> <p>15 Go ahead, Ms. Hunker.</p> <p>16 Q. (By Ms. Hunker) So only certain types of</p> <p>17 voting assistance are -- let me -- let me rephrase the</p> <p>18 question.</p> <p>19 Only people who are offering certain types of</p> <p>20 voting assistance sign on the ePad; is that correct?</p> <p>21 A. Yes.</p> <p>22 MS. PERALES: Same objection.</p> <p>23 Q. (By Ms. Hunker) And how much familiarity do</p> <p>24 you have with the ePad or the process in which an</p> <p>25 assistor would sign the ePad?</p>

<p style="text-align: right;">Page 54</p> <p>1 A. I've been trained on it, and I've helped --</p> <p>2 I've trained others on my staff. I've trained them on</p> <p>3 it, as well.</p> <p>4 Q. So is this part of your responsibilities?</p> <p>5 A. Not at the polls.</p> <p>6 Q. But you said you have trained on this</p> <p>7 particular device; is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. And you've trained others?</p> <p>10 A. Right.</p> <p>11 Q. And have you seen it work and function?</p> <p>12 A. Yes.</p> <p>13 Q. And are you familiar with how it operates?</p> <p>14 A. Yes.</p> <p>15 Q. And you're familiar with the procedures in</p> <p>16 which it -- it operates on this?</p> <p>17 A. Yes.</p> <p>18 MS. HUNKER: All right. No further</p> <p>19 questions.</p> <p>20 MS. PERALES: I have questions if Defense</p> <p>21 Counsel don't.</p> <p>22 MR. STOOL: No, I don't have any.</p> <p>23 MS. PERALES: Okay.</p> <p>24 REEXAMINATION</p> <p>25 BY MS. PERALES:</p>	<p style="text-align: right;">Page 56</p> <p>1 assistor?</p> <p>2 A. Uh-huh.</p> <p>3 Q. The voter says, I -- I want to bring this</p> <p>4 person here to help me vote, and then the assistor signs</p> <p>5 the oath; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. And are -- do you know if there's criteria that</p> <p>8 election judges and poll workers use to decide whether</p> <p>9 someone who's pushing a wheelchair, for example, is or</p> <p>10 isn't an assistor?</p> <p>11 A. Is there a criteria?</p> <p>12 Q. Yeah. Do the poll workers make the decision,</p> <p>13 who is an assistor? You know, what kind of help makes</p> <p>14 you an assistor or not? Do -- are you aware of any</p> <p>15 criteria that the poll workers use to make that</p> <p>16 decision?</p> <p>17 A. They have a training guide, yes.</p> <p>18 Q. Okay. And so do you -- can you say, sitting</p> <p>19 here today, whether someone who's pushing a wheelchair</p> <p>20 with a voter and then comes in with them and over to the</p> <p>21 voting station, can you say whether, sitting here today,</p> <p>22 you know whether the poll workers would ask that person</p> <p>23 who was pushing a wheelchair to sign the oath or not?</p> <p>24 MS. HUNKER: Objection, form.</p> <p>25 A. Yes, because that person would have to say, "I</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Well, Mr. Lopez, I spoke too soon when I said I</p> <p>2 was done with you.</p> <p>3 Do you work at the polling place on Election</p> <p>4 Day?</p> <p>5 A. No.</p> <p>6 Q. Do you make a decision or have you ever made</p> <p>7 the decision whether somebody who is coming into the</p> <p>8 polling place to assist another voter has to sign the</p> <p>9 Oath of Assistance?</p> <p>10 A. Not at the polls, no.</p> <p>11 Q. Are you aware of the criteria that poll workers</p> <p>12 and election judges use to decide who has to sign the</p> <p>13 Oath of Assistance when they come with a voter to the</p> <p>14 polling place?</p> <p>15 MS. HUNKER: Ob- --</p> <p>16 A. Yes.</p> <p>17 MS. HUNKER: -- -jection, form.</p> <p>18 A. Yes.</p> <p>19 Q. (By Ms. Perales) Say that again.</p> <p>20 A. Yes.</p> <p>21 Q. And what is that criteria, then?</p> <p>22 A. If they are -- if the voter requests</p> <p>23 assistance, that's the person that will be signing the</p> <p>24 ePollbook.</p> <p>25 Q. Okay. And so the voter comes with the</p>	<p style="text-align: right;">Page 57</p> <p>1 need assistance, and here's my assistor" --</p> <p>2 Q. (By Ms. Perales) Okay.</p> <p>3 A. -- yes.</p> <p>4 Q. So, in that instance, the person pushing the</p> <p>5 wheelchair and going over to the voting station with the</p> <p>6 voter is the assistor who would sign the oath; is that</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 MS. PERALES: Okay. Thank you.</p> <p>10 I pass the witness.</p> <p>11 MR. WHITE: I have no further questions.</p> <p>12 MS. HUNKER: Just to quickly clarify on a</p> <p>13 point, assuming there's no other questions from the</p> <p>14 attorneys on Zoom. Hearing none --</p> <p>15 MS. BENDER: No questions.</p> <p>16 MR. STOOL: ID. ID. Who said that?</p> <p>17 MS. PERALES: Oh, that's -- that's Brady.</p> <p>18 THE REPORTER: Thank you.</p> <p>19 MS. BENDER: I'm sorry. That's right. No</p> <p>20 questions at this time. Thank you.</p> <p>21 REEXAMINATION</p> <p>22 BY MS. HUNKER:</p> <p>23 Q. So in the example where an individual is being</p> <p>24 pushed, the way that the as- -- the way they would sign</p> <p>25 the eBook or ePad is if they were announced, "This is my</p>

<p style="text-align: right;">Page 58</p> <p>1 assistor"; is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. And so if the person who is voting chooses not</p> <p>4 to state, "This is my assistor," that person would not</p> <p>5 sign the eBook; is that correct?</p> <p>6 A. Correct.</p> <p>7 MS. HUNKER: Thank you.</p> <p>8 MS. PERALES: And so subject to another</p> <p>9 witness saying that they can't testify on a topic that</p> <p>10 Mr. Lopez says he has knowledge of, then I think we can</p> <p>11 switch over to the next witness now.</p> <p>12 MR. STOOL: Okay. Mr. Lopez needs to get</p> <p>13 back to the Elections Department, which is not that far</p> <p>14 from here, but -- so if he has to come back, he'll have</p> <p>15 to drive back down here. But he's got duties he's got</p> <p>16 to take care of because early voting is going on as</p> <p>17 we're having this conversation.</p> <p>18 MS. PERALES: Understood.</p> <p>19 MR. STOOL: Okay. So --</p> <p>20 MS. PERALES: Shall we take a moment off</p> <p>21 the record --</p> <p>22 MR. STOOL: Sure.</p> <p>23 MS. PERALES: -- to switch out our</p> <p>24 witnesses.</p> <p>25 MR. STOOL: Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. What does that mean?</p> <p>2 A. That means a voter can go into the polls and</p> <p>3 just select a party, and it would select all those</p> <p>4 candidates on that party.</p> <p>5 Q. So voters had an opportunity to vote straight</p> <p>6 ticket in 2018, correct?</p> <p>7 A. Yes.</p> <p>8 Q. They did not have that opportunity in November</p> <p>9 2020; is that correct?</p> <p>10 A. That's correct.</p> <p>11 Q. And they will not have that opportunity in</p> <p>12 November 2022; is that correct?</p> <p>13 A. That's correct.</p> <p>14 Q. And that's because the law changed in</p> <p>15 between -- or I should say before November 2020</p> <p>16 election; is that correct?</p> <p>17 A. Correct.</p> <p>18 Q. And so Texas no longer allows straight ticket</p> <p>19 voting; is that correct?</p> <p>20 A. Yes.</p> <p>21 MS. HUNKER: Thank you.</p> <p>22 THE WITNESS: Okay. Thanks.</p> <p>23 MS. PERALES: And --</p> <p>24 THE REPORTER: I'm sorry. Can you wait</p> <p>25 one second? Thank you.</p>
<p style="text-align: right;">Page 59</p> <p>1 THE VIDEOGRAPHER: Okay. We're going off</p> <p>2 the record. The time is 11:53 a.m.</p> <p>3 (Break taken.)</p> <p>4 (Deposition Exhibit Number 3 marked.)</p> <p>5 THE VIDEOGRAPHER: Okay. We're back on</p> <p>6 the record. The time is 12:06 p.m.</p> <p>7 REEXAMINATION</p> <p>8 (Continued)</p> <p>9 BY MS. HUNKER:</p> <p>10 Q. Hi, Mr. Lopez.</p> <p>11 A. Hi.</p> <p>12 Q. I am sorry to bring you back onto the hot seat,</p> <p>13 but I had one or two more questions for you in relation</p> <p>14 to the document that you and your Counsel had produced</p> <p>15 to us during the deposition.</p> <p>16 A. (Witness moves head up and down.)</p> <p>17 Q. So you see -- do you have in front of you the</p> <p>18 document that says "Summary Report GRP-Detail," and then</p> <p>19 it says "2018 General & Joint Election"?</p> <p>20 A. Yes.</p> <p>21 Q. And this is for November 6, 2018, correct?</p> <p>22 A. Correct.</p> <p>23 Q. And then there's a part here that says straight</p> <p>24 ticket; is that right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 61</p> <p>1 REEXAMINATION</p> <p>2 BY MS. PERALES:</p> <p>3 Q. And just a couple of questions also about this</p> <p>4 document, which I would like the court reporter to hand</p> <p>5 to you, and it has been marked as Exhibit 3.</p> <p>6 (Document handed to the witness.)</p> <p>7 Q. So, Mr. Lopez, you've been handed what has been</p> <p>8 marked Exhibit 3, and do you recognize those as the two</p> <p>9 pages that you brought with you today to the deposition?</p> <p>10 A. Yes.</p> <p>11 Q. And you described them a little bit earlier in</p> <p>12 the deposition; is that right?</p> <p>13 A. Yes.</p> <p>14 Q. And just for the sake of the record, on this</p> <p>15 first page of the exhibit, which is dated November 6th,</p> <p>16 2018, can you tell me what that last column is that is</p> <p>17 titled ED, underscore, ADA?</p> <p>18 A. ED's for Election Day. ADA is for America's</p> <p>19 Disability Act, and that's for voters with disabilities</p> <p>20 that are voting.</p> <p>21 Q. And is it voters who used a special machine to</p> <p>22 vote?</p> <p>23 A. Yes. An ADA machine, yes.</p> <p>24 Q. All right. So if a voter came in with an</p> <p>25 assistant to help that voter vote on a regular machine,</p>